

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**JACOVETTI LAW, P.C., ET AT.,**

Plaintiffs,

v.

**JAMES EVERETT SHELTON, ET AL.,**

Defendants.

Case No. 2:20-cv-00163-JDW

Hon. Joshua D. Wolson

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**DEFENDANTS' MOTION TO STRIKE DEFENDANTS' RESPONSES IN OPPOSITION  
TO MOTION FOR SANCTIONS (ECF NOs. 52-53) FOR FAILURE TO COMPLY WITH  
SECTION I.C.1 OF JUDGE WOLSON'S POLICIES AND PROCEDURES**

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Defendants James Everett Shelton and Final Verdict Solutions, *by and through the undersigned counsel*, hereby bring the following Motion to Strike Plaintiffs' Responses in opposition to Motion for Sanctions, and in support of his Motion avers as follows:

1. Plaintiffs' responses in opposition to Defendants' Motion for Sanctions (ECF No. 52-53) both failed to comply with Section I.C.1 of Judge Wolson's Policies and Procedures.
2. Specifically, Plaintiffs' counsel lumped all exhibits together with his brief, rather than uploading them separately as individual exhibits, as required by the Court's procedures.
3. Plaintiffs' counsel, Joshua L. Thomas, previously had his Brief in Opposition to the Motion to Dismiss (ECF No. 47) stricken for failure to comply with Section I.C.1. of Judge Wolson's Policies and Procedures. See ECF No. 48.
4. Therefore, this is the not the first time that Plaintiffs' counsel has failed to comply with Judge Wolson's policies and procedures.

5. The Court should again strike Plaintiffs' submissions pursuant to Rule 12(f) and its own inherent authority to enforce its policies and procedures.
6. Alternatively, the Court should strike Plaintiffs' pleading as untimely, as the deadline for submission was July 7, 2020, and Plaintiffs filed their pleadings on July 14, 2020 (seven days late), without seeking (or being granted) an extension of time.

WHEREFORE, Defendants request that Plaintiffs' Responses in Opposition to the Motion for Sanctions (ECF No. 52-53) be STRICKEN as untimely and/or for failure to comply with Section I.C.1 of Judge Wolson's Policies and Procedures, and for any further such relief as the Court deems appropriate.<sup>1</sup>

Respectfully submitted,

**REO LAW, LLC**

/s/ Bryan A. Reo

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*Attorney for James Everett Shelton and Final  
Verdict Solutions*

*July 16, 2020*

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<sup>1</sup> Defendants would respectfully remind this Court that prior lesser sanctions have not seemed to deter Joshua Thomas from the sort of ongoing misconduct he is presently engaged in and that unfortunately Mr. Thomas has repeatedly attempted to defeat the sanctions, circumvent the sanctions, or feign compliance. In any event, Mr. Thomas appears to have an attitude of flippant dismissiveness over having been sanctioned and the possibility of facing further sanctions.

**CERTIFICATE OF SERVICE**

I, Bryan A. Reo, affirm that I am an attorney of record for a party to the above-captioned civil action, and on July 16, 2020, I submitted the foregoing to the Clerk of Court's Electronic Filing System, which should automatically provide notification to all attorneys of record that said filing has been submitted.

Dated: July 16, 2020

/s/ Bryan A. Reo

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